

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 24-CR-36

TYLER A. LAMERS,

Defendant.

MOTION FOR ENTRY OF PRELIMINARY ORDER OF FORFEITURE

The United States of America, by its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Timothy W. Funnell, Assistant United States Attorney for said District, hereby moves this Court pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure for an order forfeiting to the United States all right, title and interest in the following properties described in the forfeiture notice of the Superseding Indictment filed March 5, 2024:

1. a Taurus 9-mm pistol, serial number AEB122435; and
2. a Canik 9-mm pistol, serial number 23CT31050.

This motion is based on the provisions of Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c), and on all proceedings of record in this case. In particular, defendant Tyler A. Lamers pled guilty to Counts Two and Three of the Superseding Indictment and pursuant to his plea agreement, agreed to the forfeiture of the properties listed in the Superseding Indictment.

The United States further moves for the dismissal of the Taurus 9-mm pistol, bearing serial number AEB091363, described in the Superseding Indictment filed on March 5, 2024. I have been informed that this firearm was never recovered by law enforcement. Therefore, it is no longer necessary to pursue the judicial forfeiture of this item.

No affidavit or memorandum is submitted in support of this motion.

Dated at Green Bay, Wisconsin, this 3rd day of June, 2024.

GREGORY J. HAANSTAD
United States Attorney

By: s/ TIMOTHY W. FUNNELL
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